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November 21, 2018

VIA ECF

Honorable Cheryl L. Pollak
United States Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Freeman, et al. v. HSBC Holdings plc, et al.*, 14-cv-6601 (DLI)(CLP)

Dear Judge Pollak:

Pursuant to the Court's November 7, 2018 Order, Plaintiffs' counsel sent defense counsel a copy of the current proposed Third Amended Complaint ("TAC") today, with the new plaintiff allegations provided in redline so they can be easily identified. Copies of the correspondence and the proposed TAC are attached herein as Exhibit A and Exhibit B, respectively.

We have asked defense counsel, to the extent they are willing to consent to Plaintiffs amending the operative complaint generally, that they also consent to permitting that filing to occur at the end of next month to allow additional claimants to join the *Freeman* complaint, rather than compelling them to file a separate, related action.

Respectfully submitted,

/s/ Gary M. Osen

cc: All counsel via ECF